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January 21, 2015

Hon. Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Glenn Thomas
Ind. No. 12 Cr 626 (ER)

Dear Judge Ramos:

This letter is respectfully submitted to request an additional extension of time for the filing of post-verdict motions from January 22, 2015 to February 23, 2015. The reason for this request is that I received this afternoon by fax from your chambers correspondence sent to the court from my client raising a number of issues. I am prepared to file my motion tomorrow after having been working on it for the last few weeks, but out of deference to my client I should see him again in the MCC to attempt to address the issues he has raised. The government consents to this request. Thank you for your consideration of this matter.

Respectfully yours,



Michael H. Sporn

MHS/ss
Cc: Kan M. Nawaday, Esq. (By ECF)